

2008 Oct-02 PM 11:46

U.S. DISTRICT COURT
OF ALABAMA

EXHIBIT

A

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**PENNSYLVANIA NATIONAL
MUTUAL INSURANCE COMPANY**

Plaintiff,

vs.

HANNA STEEL CORPORATION, et al.

Defendants.

JURY TRIAL DEMANDED

CV-08-J-0635-S

AFFIDAVIT OF RANDALL S. RAIFORD

STATE OF ALABAMA

COUNTY OF JEFFERSON

I Randall S. Raiford, being duly sworn, deposes and says:

1. I am over the age of 18 and competent to make this Affidavit in all respects.
2. I am employed by Hanna Steel Corporation.
3. I am familiar with Hanna Steel Corporation's ("Hanna Steel") insurance policies and files, including the policy for December 1, 1998 to December 1, 1999, issued to Hanna Steel by The American Insurance Company, a Fireman's Fund company.

4. This Affidavit is based on my review of the information, records and materials contained in the files maintained by Hanna Steel in its ordinary course of business. If called, I can and will competently testify as to the truth of the facts contained herein.

5. Annexed hereto as Exhibit "1" is a true and correct copy of documents that were included as part of the Commercial General Liability insurance policy to Hanna Steel Corporation ("Hanna Steel"), number KXC80371919 for the period December 1, 1998, to December 1, 1999 (the "FFIC Policy").

6. The attached documents were provided to Hanna Steel by its insurance broker,
McGriff Seibels.

I declare under penalty of perjury that the foregoing is true and correct.

Randall S. Raiford

Sworn to and subscribed before me this 2nd day of October, 2008.

NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: May 9, 2011
BONDED THRU NOTARY PUBLIC UNDERWRITERS

Brenda J. Thomas
NOTARY PUBLIC

My Commission Expires

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0010344 CIZ 03 KPCGOWDA10AS01 11

FIELD

**Final Premium Summary**

POLICY NUMBER 7 50 KXC 80371919

Insured
HANNA STEEL CORPORATION

Producer Code 01-490-869 AHD 05

Producer Name and Address
MCGRIFF, SEIBELS & WILLIAMS
P.O. BOX 10265
BIRMINGHAM

AL 35202

HANNA STEEL

Policy Period 12-01-98 to 12-01-99

Rating Period 12-01-98 to 12-01-99

Quote 60-29024-01 Pol Sub Code
Under Grp 7 Under Id EH
Risk Id 113 Member
Branch ATLANTA

SIC Code 3317 U/W PROG. 583

ESTIMATED PREMIUM BINDER ISSUED FOR THIS POLICY
SIF ISSUE HAS PREMIUM/INSTALLMENTS

COVERAGE	COMM	PREMIUM	FLAT	SIZE	EXPER	SCHED	EXPEN
GENERAL LIABILITY	0.0	26,365	00 %	00 %			
GEN LIAB Manual Rated	0.0	335					

TOTAL PREMIUM 26,700.00
The premium is subject to the Installment Plan

For Manually Rated Premium Modifiers and Adjustment Frequency, see worksheets.

CEI 01/15/99

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061035A CIZ 03 EPC0.0150A154801 M

FIELD

**Gross/Net Premium Summary**

POLICY NUMBER 7 60 KXC 80371919

Insured HANNA STEEL CORPORATION

Producer Code 01-490-059 AID 00

Producer Name and Address
 HCGRIFF, SEIBELS & WILLIAMS
 P. O. BOX 10265
 BIRMINGHAM AL 35202

HANNA STEEL

Policy Period 12-01-98 to 12-01-99

Quote 60-29024-01

Rating Period 12-01-98 to 12-01-99

ESTIMATED PREMIUM BINDER ISSUED FOR THIS POLICY
 SIF ISSUE HAS PREMIUM/INSTALLMENTS

COVERAGE	COMM PCI	GROSS PREMIUM	ESTIMATED NET PREMIUM
GENERAL LIABILITY	0.00	26,365	26,365.00
GEN LIAB Manual Rated	0.00	335	335.00
TOTAL PREMIUM		26,700.00	26,700.00

The premium is subject to the installment plan

INSTALLMENT SUMMARY

	GROSS AMOUNT	ESTIMATED NET PREMIUM
INCEPTION	6,676.00	6,676.00
01-01-99	2,503.00	2,503.00
02-01-99	2,503.00	2,503.00
03-01-99	2,503.00	2,503.00
04-01-99	2,503.00	2,503.00
05-01-99	2,503.00	2,503.00
06-01-99	2,503.00	2,503.00
07-01-99	2,503.00	2,503.00
08-01-99	2,503.00	2,503.00

THIS INFORMATION IS AN ESTIMATE ONLY

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POLICY NO. 7 60 KXC 80371919

FIELD

POLICY NUMBER
7 60 KXC 80371919Previous Policy Numbers
NEW

Coverage for policies
other than WORKERS'
COMPENSATION is provided
in the following company
THE AMERICAN
INSURANCE COMPANY
OMAHA, NE 68154
A STOCK INSURANCE CO. (18)

GENERAL DECLARATIONS

Named Insured and Mailing Address

RISK ID. 113/

HANNA STEEL CORPORATION; HANNA TRUCK LINES, INC.
(Named Insureds are continued following the Premium Summary section of
these General Declarations)
3812 COMMERCE AVENUE
FAIRFIELD AL 35064

Producer Name and Address
HOGGIF, SEIBELS & WILLIAMS
P O BOX 10265
BIRMINGHAM AL 35202

HANNA STEEL

The Named Insured is a(n) CORPORATION

Business or Operations of the Named Insured: MANUF. OF ALUMINUM WINDOWS.

The insurance provided by this policy consists of the following coverage
form(s). The premium may be subject to adjustment. In return for payment of
the premium and subject to all the terms of this policy, we agree with you to
provide the insurance as stated in this policy.

GENERAL LIABILITY COVERAGES - OCCURRENCE

Policy Period (For above coverage(s))

Policy Period is from 12-01-98 to 12-01-99 12:01 A.M., Standard Time
at the mailing address of the insured.

PREMIUM SUMMARY:

Estimated Total Annual Premium \$26,700.00
Premium is payable in installments as follows:

\$6,476.00	Due at Inception	\$2,503.00	Due 01-01-99
\$2,503.00	Due 02-01-99	\$2,503.00	Due 03-01-99
\$2,503.00	Due 04-01-99	\$2,503.00	Due 05-01-99
\$2,503.00	Due 06-01-99	\$2,503.00	Due 07-01-99
\$2,503.00	Due 08-01-99		

(Named Insured continued)

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POLICY NUMBER 7 60 KKG 80371919

Named Insured
HANNA STEEL CORPORATION

GENERAL DECLARATIONS continued

A STOCK INSURANCE CO. (18)

(Named Insured continued)
HANNA TRUCK LINES, INC
ANY ENTITY NOW IN EXISTENCE
ALL PENSION AND BENEFIT PLANS

LOCATION OF PREMISES

LOC.	LOC.	LOC.	LOC.	LOC.
001	3812 COMMERCE AVENUE FAIRFIELD	AL 55064	JEFFERSON	(COUNTY)
002	3608 AVENUE C FAIRFIELD	AL 55064	JEFFERSON	(COUNTY)
003	3001 HICKORY STREET GADSDEN	AL 35904	ETOWAH	(COUNTY)
004	1701 BOLONE BLVD TUSCALOOSA	AL 35402	TUSCALOOSA	(COUNTY)
005	LOT 20-26 BAY VIEW HEIGHT PANAMA CITY	FL 32401	BAY	(COUNTY)

FORMS ATTACHED AT INCEPTION

GENERAL PROVISIONS

IL0003-04-98 CALCULATION OF PREMIUM (IL 00 03 04 98)
 IL0017 11-98 REV COMMON POLICY CONDITIONS (IL 00 17 11 98)
 IL0021 04-98 NUCLEAR ENERGY LIABILITY EXCLUSION ENDORSEMENT (BROAD FORM)
 (IL 00 21 04 98)

GENERAL LIABILITY

CO0001 01-96 COMMERCIAL GENERAL LIABILITY COVERAGE FORM (CG 00 01 01 96)
 CO0054 03-97 AMENDMENT OF POLLUTION EXCLUSION - EXCEPTION FOR BUILDING
 HEATING EQUIPMENT (CG 00 54 03 97)
 CO0055 03-97 AMENDMENT OF OTHER INSURANCE CONDITION (OCCURRENCE VERSION)
 (CG 00 55 03 97)
 CG2147 10-93 EMPLOYMENT - RELATED PRACTICES EXCLUSION (CG 21 47 10 93)
 CG2149 01-96 TOTAL POLLUTION EXCLUSION ENDORSEMENT (CG 21 49 01 96)
 CG7093 12-92 COMPLETE ASBESTOS EXCLUSION (CG 70 93 12 92)
 CG7158 07-96 MULTICOVER (CG 71 58 07 96)
 EN7000 12-97 EMPLOYEE BENEFITS ADMINISTRATION ERRORS AND OMISSIONS
 INSURANCE (EN 70 00 12 97)

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00197A G12 04 EPCG,0192,B18E001

FIELD



POLICY NUMBER 7 60 KXC 8037 19 19

Named Insured
HANNA STEEL CORPORATION

Sequential Endorsement Number 882

CHANGE ENDORSEMENT
Effective 12/01/98, 12:01 A.M.,
Standard Time at the address of the insured

This is an Endorsement only. Other than changes shown, all other pre-existing coverage remains in full force and effect. Premium adjustments are shown.

PREMIUM SUMMARY:

ADDITIONAL PREMIUM DUE NOW

\$0.00

The following other General Liability endorsement(s) are added to the policy and apply as shown:

MULTICOVER
AMENDMENT OF C07158-8796 MULTICOVER
C07158 8796IT IS AGREED THAT ITEM 8, NON-OWNED OR CHARTERED WATERCRAFT
SECTION (2) (A) IS AMENDED TO READ AS FOLLOWS:(2) A WATERCRAFT YOU DO NOT OWN THAT IS:
"LESS THAN 60 FEET LONG AND"

ALL OTHER WORDING REMAINS UNCHANGED.

Countersignature of Authorized Agent:
Producer MCORTIFF, SEIBELS & WILLIAMS
P O BOX 10265
BIRMINGHAM

AL 35202

HANNA STEEL

Date 05/19/00

CHANGE ENDORSEMENT CONTINUED ON PAGE 2

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POLICY NUMBER 7 60 KXC 8037 19 19

Named Insured
HANNA STEEL CORPORATION

Sequential Endorsement Number 002 (continued)

RATING PERIOD 12-01-98 TO 12-01-99

GENERAL LIABILITY SCHEDULE

Premise 01	Location 001	3412 COMMERCE AVENUE FAIRFIELD	AL 35064	JEFFERSON	(CNTY)
	Location 002	3606 AVENUE C FAIRFIELD	AL 35064	JEFFERSON	(CNTY)
	Location 003	3001 HICKORY STREET GADSDEN	AL 35904	ETOWAH	(CNTY)
	Location 004	1781 BOLUNE BLVD TUSCALOOSA	AL 35402	TUSCALOOSA	(CNTY)
	Location 005	LOT 20-26 BAY VIEW HEIGHT PANAMA CITY	FL 32401	BAY	(CNTY)

Classification(s)	Base of Premium	Exposure	Rate
Premise 01			
Premises/Operations METAL DLRS/DISTRBS- STRUCTURAL	GROSS SALES	150,000,000	.0872
Products/Completed Operations METAL DLRS/DISTRBS- STRUCTURAL	GROSS SALES	150,000,000	.0860
MULTICOVER			250

END OF CHANGE ENDORSEMENT

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POLICY NUMBER 7 60 KXC 4037 19 19

Named Insured
HANNA STEEL CORPORATION

Sequential Endorsement Number 001

CHANGE ENDORSEMENT
Effective 12/01/98, 12:01 A.M.,
Standard Time at the address of the insured

This is an Endorsement only. Other than changes shown, all other pre-existing coverage remains in full force and effect. Premium adjustments are shown.

PREMIUM SUMMARY:

ADDITIONAL PREMIUM DUE NOW

\$165.00

The Premium shown includes Adjustable Premium(s). Refer to Premium Adjustment Information attached.

The Name of the Named Insured is amended to read:
HANNA STEEL CORPORATION; HANNA TRUCK LINE, INC.
HANNA TRUCK LINE, INC
ANY ENTITY NOW IN EXISTENCE
ALL PENSION AND BENEFIT PLANS

The Limits of Insurance shown in the Commercial General Liability Declarations for the Coverage Part(s) described are replaced by the limits designated below. These limits are inclusive of and not in addition to the limits being replaced.

Coverages	Limits of Liability
COMMERCIAL GENERAL LIABILITY COVERAGE PART	
GENERAL AGGREGATE LIMIT (Other than Products - Completed Operations)	\$2,000,000
PRODUCTS - COMPLETED OPERATIONS AGGREGATE LIMIT	\$2,000,000
PERSONAL & ADVERTISING INJURY LIMIT	\$1,000,000
EACH OCCURRENCE LIMIT	\$1,000,000
FIRE DAMAGE LIMIT	ANY ONE FIRE \$100,000
MEDICAL EXPENSE LIMIT	ANY ONE PERSON \$5,000

Countersignature of Authorized Agent:
Producer MCORIFF, SEIBELS & WILLIAMS
P O BOX 18265
BIRMINGHAM

AL 35202

HANNA STEEL

Date 05/05/99

CHANGE ENDORSEMENT CONTINUED ON PAGE 2

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POLICY NUMBER 7 60 KXC 8037 18 19

Named Insured
HANNA STEEL CORPORATION

Sequential Endorsement Number 001 (continued)

The following other General Liability endorsement(s) are added to the policy and apply as shown:

ADDITIONAL INSURED - VOLUNTEER WORKERS
C02021 1093

EMPLOYEE BENEFITS ADMINISTRATION
ERRORS AND OMISSIONS INSURANCE
EB7000 1297

THESE DECLARATIONS ARE ISSUED IN CONJUNCTION WITH AND ARE PART OF
COVERAGE FORM EB 70 00.

DECLARATIONS

INSURANCE IS PROVIDED ONLY FOR THOSE COVERAGES FOR WHICH LIMITS OF
INSURANCE ARE STATED IN THE PLACE PROVIDED IN THESE DECLARATIONS.

LIMITS OF INSURANCE

EACH EMPLOYEE LIMIT \$ 1,000,000
AGGREGATE LIMIT \$ 1,000,000

NOTICE OF OCCURRENCE - GENERAL LIABILITY
NF6000821 0894

The following other General Liability endorsement(s) are deleted from the policy:

TOTAL POLLUTION EXCLUSION ENDORSEMENT
C02149 0136

CHANGE ENDORSEMENT CONTINUED ON PAGE 3.

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0001248 CIZ 04 EFCW.0150.B010001

FIELD

POLICY NUMBER 7 50 KXC 8037 19 19

Named Insured
HANNA STEEL CORPORATION

Sequential Endorsement Number 001 (continued)

RATING PERIOD 12-01-98 TO 12-01-99

GENERAL LIABILITY SCHEDULE

Premises 01	Location 001	3512 COMMERCE AVENUE FAIRFIELD	AL 35064	JEFFERSON	(CNTY)
	Location 002	3608 AVENUE C FAIRFIELD	AL 35064	JEFFERSON	(CNTY)
	Location 003	3001 HICKORY STREET GADSDEN	AL 35904	ETOWAH	(CNTY)
	Location 004	1701 BOLONE BLVD TUSCALOOSA	AL 35402	TUSCALOOSA	(CNTY)
	Location 005	18Y 20-26 BAY VIEW HEIGHT PANAMA CITY	FL 32401	BAY	(CNTY)

Classification(s)	Base of Premium	Exposure	Rate
Premises 01			
Premises/Operations METAL DLRS/DISTRBS- STRUCTURAL	GROSS SALES	150,000,000	.0872
Products/Completed Operations METAL DLRS/DISTRBS- STRUCTURAL	GROSS SALES	150,000,000	.0830
MULTICOVER			250

CHANGE ENDORSEMENT CONTINUED ON PAGE 4

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POLICY NUMBER 7 60 1010 5037 19 19

Named Insured
HANNA STEEL CORPORATION

Sequential Endorsement Number 001 (continued)

Forms Added at the Inception of this Change Endorsement

GENERAL LIABILITY

CG2021 10-93

NP6000021 08-94

END OF CHANGE ENDORSEMENT

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001035A Q1Z 00 EPCG.0160A10A001 M

FELD

POLICY NUMBER 7 60 KXC 80371919

Named Insured
HANNA STEEL CORPORATION

GENERAL DECLARATIONS continued

FORMS ATTACHED AT INCEPTION

GENERAL LIABILITY

180007 11-85 COMPOSITE RATING PLAN (180007 11 85)

Countersignature of Authorized Agent: _____

Producer MCGRIFF, SEIBELS & WILLIAMS
P O BOX 10265
BIRMINGHAM

AL 35202

Date 01/15/99
HANNA STEEL

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007024 012 00 EFCO.CISG.AIRAGS: M

FIELD

POLICY NUMBER 7 40 KXC 80871919

NAMED INSURED
HANNA STEEL CORPORATION

GENERAL LIABILITY DECLARATIONS

Insurance is provided only for those Coverages, Limits of Liability and Endorsements shown below.

Coverages	Limits of Liability
COMMERCIAL GENERAL LIABILITY COVERAGE PART	
GENERAL AGGREGATE LIMIT (Other Than Products - Completed Operations)	\$2,000,000
PRODUCTS - COMPLETED OPERATIONS AGGREGATE LIMIT	2,000,000 End 1
PERSONAL & ADVERTISING INJURY LIMIT	\$1,000,000
EACH OCCURRENCE LIMIT	\$1,000,000
FIRE DAMAGE LIMIT	ANY ONE FIRE \$100,000
MEDICAL EXPENSE LIMIT	ANY ONE PERSON \$5,000

The audit period shall be ANNUAL

GENERAL LIABILITY ENDORSEMENT(S)

EMPLOYMENT - RELATED PRACTICES EXCLUSION (CG 21 47 10 93)

MULTICOVER (CG 71 58 07 96)

AMENDMENT OF POLLUTION EXCLUSION - EXCEPTION FOR BUILDING HEATING EQUIPMENT (CG 00 54 03 97)

AMENDMENT OF OTHER INSURANCE CONDITION (OCCURRENCE VERSION) (CG 00 55 03 97)

OTHER GENERAL LIABILITY ENDORSEMENT(S)

TOTAL POLLUTION EXCLUSION ENDORSEMENT
C02149 0196

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POLICY NUMBER 7 60 KXC 80371919
 NAMED INSURED
 HANNA STEEL CORPORATION

COMMERCIAL GENERAL LIABILITY DECLARATIONS (continued)
 OTHER GENERAL LIABILITY ENDORSEMENT(S) (continued)

COMPLETE ASBESTOS EXCLUSION
 C87093 1292

COMPOSITE RATING PLAN
 180007-11-19
 180007 1185

DECLARATIONS

ESTIMATED EXPOSURE	RATE
\$150,000,000	6.1780
ESTIMATED PREMIUM	MINIMUM PREMIUM
\$26,700	\$26,700

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001032A CIZ 01 EPCG.0130.410A991 M

FIELD

POLICY NUMBER 7 60 KXC 80371919

NAMED INSURED
HANNA STEEL CORPORATION

RATING PERIOD 12-01-98 TO 12-01-99

GENERAL LIABILITY SCHEDULE

Premise 01	Location 001	3812 COMMERCE AVENUE FAIRFIELD	AL 35064	JEFFERSON	(CNTY)
	Location 002	3600 AVENUE C FAIRFIELD	AL 35064	JEFFERSON	(CNTY)
	Location 003	3001 HICKORY STREET GADSDEN	AL 35904	ETCHAH	(CNTY)
	Location 004	1701 BOLOME BLVD TUSCALOOSA	AL 35402	TUSCALOOSA	(CNTY)
	Location 005	LOT 20-26 BAY VIEW HEIGHT PANAMA CITY	FL 32401	BAY	(CNTY)

Classification(s)	Bases of Premium	Exposure	Rate
Premise 01			
Premises/Operations METAL BLS/DISTRBS- STRUCTURAL	GROSS SALES	150,000,000	.0872
Products/Completed Operations METAL BLS/DISTRBS- STRUCTURAL	GROSS SALES	150,000,000	.0869
MULTICOVER			250

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